

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and
others similarly situated,

Plaintiff,

v.

REGISTER.COM, INC.

Defendant.

Case No.: 1:25-cv-00275-JPH-MJD

Judge: Robert J. White

Magistrate Judge: Mark J. Dinsmore

JOINT SUPPLEMENTAL REPORT ON THE STATUS OF DISCOVERY

Pursuant to this Court’s June 24, 2025 Order, ECF No. 29, Tiffany Lewis (“Plaintiff”) and Register.com, Inc.¹ (“Defendant”) (jointly, the “Parties”) submit this Joint Report on the Status of Discovery. The information provided herein is intended to supplement the Status Report submitted by the Parties on September 22, 2025.

Joint Report on the Status of Discovery

1. A detailed description of all discovery completed to date.
 - On October 3, 2025, in accordance with the Court’s September 16, 2025, Order (ECF. 42) Defendant provided its supplemental document production to Plaintiff.
 - Upon receipt of the data, Plaintiff’s counsel sent it to their data consultant, and after review by the consultant and Plaintiff’s counsel, it was clear that the data was incomplete. Plaintiff’s counsel then initiated meet and confer efforts over the next week and a half. On October 15, 2025, the parties met and conferred regarding Defendant’s supplemental document production, during which Plaintiff informed Defendant that, following the review of the data produced, they appeared to be responsive to only two of Plaintiff’s subject requests for production, and that additional production was required in response to Requests for Production 7,8, and 10. Defendant acknowledged Plaintiff’s concerns and agrees the data was incomplete.

¹ On July 25, 2025, Register.com, Inc., merged with Network Solutions, LLC. For the sake of clarity and consistency with the current case caption, Defendant is referred to herein simply as “Register” or the “Company”.

- Following the parties' meet and confer, on October 17, 2025, Defendant informed Plaintiff that it had identified certain unintentional inconsistencies within the data previously produced and was in the process of reviewing its data to correct the issues and produce supplemental records. The second supplemental production, to be provided in accordance with the Court's Order, will be provided to Plaintiff on or before Monday, October 27, 2025.
2. A detailed description of all discovery presently scheduled or pending, including the due dates for any pending discovery requests and the scheduled dates for any depositions, and the identity of the counsel responsible for completing such discovery.
- As noted above, Defendant is working with its experts to re-extract and re-examine its data and will be providing a supplemental document production to Plaintiff prior to the parties scheduled mediation date of October 30, 2025.
 - Given that the parties are currently scheduled to engage in mediation on October 30, 2025, neither party has scheduled its depositions at this juncture.
3. A detailed description of any discovery disputes presently pending, including the status of the resolution of the dispute and the identity of the counsel responsible for resolving the dispute.
- Following their meet and confer on October 15, 2025, the parties agree that a second supplemental production is necessary in order to ensure full compliance with the Court's order. Accordingly, in an effort to address and remedy the issues identified, counsel for Defendant, Abbey Block, is working with Defendant's experts to re-extract and re-examine Defendant's records to correct the internal inconsistencies and supplement Defendant's document production. Once this process is complete, Attorney Block will produce a second supplemental production of records in response to Plaintiff's Requests for Production. This production will be provided in advance of the parties' scheduled mediation date, October 30, 2025. Again, the Plaintiff does not believe the issues identified can be meaningfully disputed and Defendant agrees that a second supplemental document production is necessary to ensure compliance with the Court's order and to facilitate a productive mediation.
4. A detailed description of all discovery that is planned to be completed within the 28-day period following the report, including the identity of the counsel responsible for completing such discovery.
- The completion of further discovery will also likely hinge on the parties' ability to successfully mediate this dispute.
5. A description of all known discovery remaining to be completed in this matter, including a proposed timetable for the completion of such discovery and the identity of the counsel responsible for completing such discovery.

- Aside from the items notated above, Plaintiff's future discovery will include a Fed. R. Civ. P. 30(b)(6) Notice and expert report related to identification of putative class members based on the Defendant's discovery responses and deposition.
- Aside from the items noted above, Defendant's future discovery efforts are likely to include an expert report related to the identification of the proposed class members. Defendant will also seek to depose Plaintiff's expert.
- The completion of further discovery will also likely hinge on the parties' ability to successfully mediate this dispute.

6. Any other discovery issues any party believes should be brought to the attention of the Court so as to avoid any further delays in the completion of discovery in this matter.

- None at this time.

Dated: October 20, 2025

/s/ Abbey Block

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Counsel for Plaintiff and the proposed class

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October 2025, I filed the foregoing with the Court's electronic filing system, which will automatically provide notice to all counsel of record.

Dated: October 20, 2025

/s/ Abbey Block
Abbey Block